

EXHIBIT K

EXHIBIT 31

EXHIBIT FILED UNDER SEAL

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT LITIGATION

Case no. 3:24-cv-07019-CRB
Case no. 3:24-cv-07821
Case no. 3:24-cv-7940
Case no. 3:23-cv-06708
Case no. 3:24-cv-04900
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*** HIGHLY CONFIDENTIAL ***

VIDEOTAPED DEPOSITION

OF

SUNNY WONG

WEDNESDAY, JULY 23, 2025

Reported by:
CANDIDA BORRIELLO
Stenographic Reporter
JOB NO. 6929785-001

1 S. Wong - Highly Confidential

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 Q. Got it. So [REDACTED] means --

7 strike that.

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 A. That is correct.

15 Q. And the same thing for the [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 A. Correct.

20 Q. Those were things that Uber knew

21 were associated with a heightened risk for

22 sexual assault or sexual misconduct, right?

23 A. We put that as one of the factors

24 or one of the features into the model. I

25 know we discussed some correlations last time

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2 Q. Yeah, it's a little messy.

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 right?

8 A. [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 Q. And right down at the bottom of
15 this slide it says that [REDACTED]

16 [REDACTED]

17 [REDACTED], right?

18 A. That's what it looks like on the
19 deck there.

20 Q. And that's your understanding,
21 right?

22 A. [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 S. Wong - Highly Confidential

2 [REDACTED]

3 Q. [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 A. [REDACTED]

8 [REDACTED]

9 Q. Great. And that conversion, is
10 that done by a human or is that done by an
11 algorithm?

12 A. [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 Q. [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 A. Say that again.

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2 Q. [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 A. Well, [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 Q. [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 A. [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 S. Wong - Highly Confidential

2 Q. [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 A. [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 Q. [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 A. [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 Q. [REDACTED]

20 [REDACTED]

21 A. [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 S. Wong - Highly Confidential

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 Q. [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 A. [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 Q. Sure. I'll reword it.

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 A. [REDACTED]

25 [REDACTED]

1 S. Wong - Highly Confidential

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 Q. I want to stick with my question,
8 not --

9 A. Yeah, yeah, go for it, please.
10 Maybe you can clarify again.

11 Q. Yeah. Is there -- we talked about
12 like for each of these cases and we're
13 getting into the other ones, [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 A. Yes.

17 Q. [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 A. Correct.

22 Q. And just to make sure I don't have
23 a problem with asking that question:

24 [REDACTED]

25 [REDACTED]

1 S. Wong - Highly Confidential

2 A. [REDACTED]

3 Q. [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 A. [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 MS. PETERS: I'm gonna object as
13 nonresponsive to everything starting
14 with the word "because."

15 Q. Let me just try to get a clean
16 question and answer.

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 A. [REDACTED]

21 Q. And that's been true for 2022, 2023
22 and 2024, right?

23 A. Yes.

24 MS. PETERS: We can take that
25 down. And I want to move to the